UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 24-3006

UNITED STATES OF AMERICA,

APPELLEE,

v.

PETER K. NAVARRO,

APPELLEE.

APPELLANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S PRINCIPAL BRIEF AND APPENDIX

Appellant Dr. Peter K. Navarro, through the undersigned counsel, respectfully moves this Court for a thirty (30) day extension of time to file his principal brief and appendix, pursuant to Federal Rules of Appellate Procedure 26(b) and 27, and Circuit Rules 27(h) and 28(e). The brief is currently due on May 28, 2024, meaning the extension would result in a new deadline of June 27, 2024. The undersigned has conferred with counsel for Appellee United States of America, who does not oppose the requested extension.

Good cause exists to grant this motion. The undersigned has worked diligently to prepare both the brief and the appendix pursuant to the current scheduling order, but with a small staff and multiple competing deadlines which mostly predate the operative scheduling order, complying with the current filing deadline is not feasible. In addition, Dr. Navarro is currently incarcerated and has

not had formal access to counsel since self-reporting to the Bureau of Prisons on March 19, 2024 (legal visits are permitted only on weekends). This is Appellant's first request for an extension, and the undersigned does not anticipate requesting another.

Accordingly, for the reasons stated herein, Dr. Navarro respectfully requests that this motion be granted and that the deadline to file his principal brief and appendix be extended to June 27, 2024.

Dated: May 22, 2024 Respectfully submitted,

/s/ Stanley E. Woodward, Jr.

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CERTIFICATE OF COMPLIANCE

I hereby certify, pursuant to Fed. R. App. P. 27(d)(2)(A) that the foregoing motion complies with the type-volume limitation because it contains 217 words and therefore, not more than 5,200 words. I further certify that this motion, pursuant to Fed. R. App. P. 27(d)(1)(E) complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the typeface style requirements of Fed. R. App. P. 32(a)(6) because the brief was prepared in 14-point Times New Roman font using Microsoft Word.

/s/	
Stanley Woodward Jr.	

CERTIFICATE OF SERVICE

I hereby certify, pursuant to Fed. R. App. P. 25(c), that on May 21, 2024, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notification to the attorneys of record in this matter who are registered with the Court's CM/ECF system.

/s/	
Stanley Woodward Jr.	